

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ORRIN T. SKRETVEDT,)	
Plaintiff,)	C. A. No. 98-61 (MPT)
)	
v.)	
)	
E.I. DU PONT DE NEMOURS AND COMPANY,)	
et.al.,)	
Defendants.)	

NOTICE OF DEPOSITION OF E. I. DUPONT DE NEMOURS & CO., et. al.
UNDER RULE 30(b)(6)

TO: MARY E. COPPER, ESQ.
KATHLEEN FUREY McDONOUGH, ESQ.
POTTER ANDERSON & CORROON LLP
1313 MARKET STREET
WILMINGTON, DE 19801

PLEASE TAKE NOTICE that Plaintiff Orrin T. Skretvedt will take deposition testimony from the above named corporation E. I. DuPont de Nemours & Co., ("Dupont") such as will provide testimony relevant to the standards and procedures utilized by DuPont in determining the financial limits and expectations needed to generate a satisfactory internal rate of return on investment and/or funds to be committed to projects, business units or platforms which will be acceptable to DuPont management to allow such financial commitment.

1. Plaintiff will depose such persons designated by DuPont that will provide testimony on behalf of DuPont at such time as may be determined by availability of said certain individuals, but not later than July 29, 2005. Should any individual be other than an officer, director or

managing agent, DuPont shall obtain consent of such individual in advance in order to allow such individual to testify.

2. Plaintiff will depose any such individuals at a location in Wilmington, Delaware and at such time or times as agreed upon by the parties, with testimony being recorded and transcribed by a certified court reporter to allow its use as written record of any testimony given.

Testimony shall be sought for the purposes of elaborating and clarifying propositions and procedures set forth in the document entitled DuPont Investment Proposal Manual provided to Plaintiff on June 18, 2005 via discovery flowing from Plaintiff's First Request for Document Production.

3. Such further individuals other than officers, directors or managing agents are requested to be available that are authors of, or had input in creating, said Investment Proposal Manual, to include Reginald C. Malmberg.

4. All such individuals designated by DuPont that will provide testimony on such investment procedures shall attend any deposition with additional or supplemental documents or other written material that will support their testimony, in addition to a reference to the said Investment Proposal Manual.

5. Depositions shall continue from day to day until completed as needed. Each deponent is to bring with him or her other written documentation as is relevant to the issues dealing with return on investment required by DuPont in making its investment decisions.

/s/ JOHN M. STULL
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Dated: July 13, 2005